

Summary of Significant Permit Changes

Ecology made the following significant changes between the formal draft and final Sand and Gravel General Permit (note the permit references below refer to the final permit unless noted otherwise):

S2. Effluent Limits

- Revised Table 2 to allow the discharge of process water associated with NAICS Code 324121 to ground, except for process water discharges from wet scrubbers.
- Revised Table 2 to group ECY001 Asphalt Recycling with NAICS Code 324121 Asphalt Paving Mixture and Block Manufacturing.
- Revised Table 3 to group ECY001 with NAICS 324121. Thus, requiring quarterly (instead of monthly) pH monitoring for ECY001 and no longer requiring total dissolved solids monitoring for process water discharges associated with ECY001.
- Deleted *Appendix C – Pollution Prevention Schedule for pH* and the associated footnotes in Table 2 and Table 3.

S3. Additional Discharge Limits

- Revised the language in S3.J.3 to align with 40 CFR §122.44(i)(4)(iv). Removed the language “*have the potential to discharge stormwater off site*” and “*or equivalent (e.g. Licensed Professional Geologist, Certified Professional Erosion and Sediment Control, etc.)*”. Added an option for permittees to conduct yearly Wet Season Inspections at their inactive site instead of hiring a Registered Professional Engineer to inspect their inactive site every three years.

S8. SMP Section 3: Stormwater Pollution Prevention PlanRe (SWPPP)

- Removed the source control BMP for release agents (S8.E.8 in the formal draft).
- Revised S8.F.1 so that the Best Management Practices (BMPs) regarding the placement of concrete recycling stockpiles only apply to sites that receive permit coverage for the first time on or after April 1, 2016.

S12. Permit Application

- Removed the language in the S12.B.4 of the formal draft permit stating that portable permittees may only operate at one site at a time.

G7. Engineering Plan Review Required

- Removed General Condition G7. ENGINEERING PLAN REVIEW REQUIRED from the permit.

Appendix C– Pollution Prevention Schedule for pH

- Deleted *Appendix C – Pollution Prevention Schedule for pH* and the associated footnotes in Table 2 and Table 3.

Summary of Additional Changes

Ecology also made the following changes between the formal draft and final Sand and Gravel General Permit (note the permit references below refer to the final permit unless noted otherwise):

Permit Revisions:

- Italicized defined words the first time they appear in the permit instead of every time they are used in the permit.

S1. Permit Coverage

- In S1.D, removed the sentence: “*All activities at the permitted site must have the appropriate permits for those uses.*”
- Revised S1.E to clarify that permittees are only authorized to discharge from the activities listed in their coverage page and to clarify when they should notify Ecology regarding modifying their coverage.

S2. Effluent Limits

- Removed the columns in Table 2 and 3 related to discharge flow monitoring and added a sentence referring to the monitoring requirements for new facilities in S12.A.
- Reworded Table 2 and 3, footnote 3 to clarify that permittees should report the presences of a visible sheen at their discharge point (as opposed to anywhere on-site) on their discharge monitoring reports. Added the language from footnote 3 related to observations of oil sheen on-site to S4.F.2.e.
- Reworded Table 2, footnote 4 for clarity.

S4. Monitoring Requirements

- In S4.G.2, added the sentence: “*Completed inspection forms, logs, checklists, or records used to meet other governmental agency requirements (e.g. Washington State Department of Transportation or Mine Safety and Health Administration requirements) may be acceptable as inspection reports provided they address the items in S4.G.1 of the permit.*”
- Removed the row from Table 4 related to discharge flow.

S8. SMP Section 3: Stormwater Pollution Prevention Plan (SWPPP)

- Revised S8.E.8 to refer to unhardened (instead of uncured) concrete and to refer to returned asphalt.
- Revised S8.E.12.c to clearly state that wheel wash and tire bath wastewater is considered process water. Ecology added that the discharge of this water is subject to the effluent limitations and monitoring requirements in Special Condition S2, Table 2, and S4.

S10. Reporting and Record Keeping Requirements

- Clarified the electronic reporting language and added a later due date for inactive sites to submit their Electronic Signature Account Forms or an Electronic Reporting Waiver.
- Relocated the production number range reporting requirements to S10.B. Permittees will report these ranges as a separate submittal from their Discharge Monitoring Reports.

S12. Permit Application

- Separated the application requirements for existing facilities planning a significant process change in S12.A.1.

G7. Engineering Plan Review Required

- Left in a placeholder to maintain numbering of General Conditions.

Appendix A – NAICS Codes, Ecology Codes, SIC Numbers, and Descriptions for Facilities Covered Under this Permit

- Added the SIC Number to the Table in Appendix A for Concrete Block and Brick.
- Added the following language to Appendix A for ECY001 and ECY002: *“Sites only storing or stockpiling hardened structural concrete / hardened asphalt, and not otherwise crushing or processing the material are not subject to coverage under this permit unless they conduct additional activities requiring coverage under this permit.”*

Appendix B – Definitions

- Revised the definition of “Application” to clarify that there are multiple types of application forms and to provide the link to Ecology’s website.
- Revised the definition of “Discharge Point” to include where the discharge leaves the permittees facility.
- Clarified in the definition for “Electronic Waiver Request” that Ecology typically only grants waivers to permittees that do not have a computer, printer, or internet connection.
- Added a definition for returned asphalt.

For additional information regarding these changes please refer to the Final Sand and Gravel General Permit issued on February 17, 2016 and the accompanying Response to Comments Document.